

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

(1)	TAMMY COVINGTON, and	)	
(2)	JEFFREY COVINGTON	)	
		)	
	PLAINTIFFS,	)	Case No. CIV-19-718-PRW
		)	
vs.		)	
		)	
(1)	CSAA FIRE AND CASUALTY	)	
	INSURANCE, d/b/a AAA FIRE AND	)	
	CASUALTY INSURANCE COMPANY,	)	
	INC.	)	
		)	
	DEFENDANT.	)	

**PLAINTIFFS' UNOPPOSED MOTION**  
**TO ENLARGE PRE-TRIAL DEADLINES**

COMES NOW, Plaintiffs Tammy and Jeffrey Covington, and respectfully moves to enlarge all pre-trial deadlines by 120 days. In support thereof, Plaintiffs show the court the following:

1. There has not been any prior request to extend any deadlines.
2. The current Covid-19 Pandemic, along with the State of Oklahoma Order, the City of Oklahoma City Order, and the City of Norman's order of shelter-in-place, has made the completion of final discovery and scheduled depositions impossible and impracticable. Given the current state of the Pandemic and uncertainty as to when restrictions will be lifted, Plaintiffs urge the court to postpone the pre-trial deadlines 120 days.

3. Counsel for Plaintiffs have spoken to counsel for Defendant and Defendant has no objection to this extension.

4. The Present Deadlines and Proposed enlargement are as follows:

Item	Present Date	Proposed Date
Discovery Deadline	April 1	July 30
Daubert Motions	April 1	July 30
Designation of Deposition Testimony	April 23	August 21
Objections and Counter Designations of Deposition Testimony	April 30	August 28
Motions in Limine	April 23	August 21
Jury Instructions	April 23	August 21
Voir Dire	April 23	August 21
Trial Briefs	April 23	August 21
Proposed Findings/Conclusions of Law	April 23	August 21
Final Pretrial Report	April 23	August 21

5. Granting this enlargement will delay trial, which is presently on the May 2020 Docket, to the September 2020 Docket.

**WHEREFORE**, Plaintiffs pray that the proposed enlargement of deadlines set out above be granted.

Respectfully submitted,

s/ Erica R. Mackey

Douglas J. Shelton, OBA #8159

Erica R. Mackey, OBA #32057

[dshelton@sheltonlawok.com](mailto:dshelton@sheltonlawok.com)

[emackey@sheltonlawok.com](mailto:emackey@sheltonlawok.com)

SHELTON WALKLEY MACKEY

7701 S. Western Ave., Suite 201

Oklahoma City, OK 73139

(405) 605-8800 - office

(405) 601-0677 - Facsimile

*ATTORNEYS FOR PLAINTIFFS,*

*TAMMY COVINGTON AND JEFFREY COVINGTON*

### **CERTIFICATE OF SERVICE**

I hereby certify that on March 25, 2020, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Gerard F. Pignato, OBA #11473

Matthew C. Kane, OBA #19502

Joshua K. Hefner, OBA #30870

RYAN WHALEY COLDIRON JANTZEN

PETERS & WEBBER PLLC

400 North Walnut Ave.

Oklahoma City, OK 73104

[jerry@ryanwhaley.com](mailto:jerry@ryanwhaley.com)

[mkane@ryanwhaley.com](mailto:mkane@ryanwhaley.com)

[jhefner@ryanwhaley.com](mailto:jhefner@ryanwhaley.com)

*ATTORNEYS FOR DEFENDANT*

/s/ Erica R. Mackey

Erica R. Mackey